

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 18-10428-ADB
	)	
FRANKLIN FREDDY MEAVE VAZQUEZ,	)	
	)	
Defendant.	)	

**JOINT MEMORANDUM PURSUANT TO LOCAL RULE 116.5(a)**

The United States and counsel for the Defendant file this joint memorandum pursuant to Local Rule 116.5(a), stating the following:

1. The government has provided automatic discovery. There are no pending discovery requests.
2. Defendant is in the process of reviewing the automatic discovery and does not yet know whether he will request additional discovery.
3. It does not appear at this time that there is a need for a protective order regarding the dissemination of sensitive information.
4. Defendant does not yet know whether he will file any pretrial motions under Rule 12(b).
5. The parties agree that the government will provide expert disclosures no later than six weeks before trial and the Defendant will provide expert disclosures no later than three weeks before trial.
6. The Court has previously excluded the period from November 15, 2018 (the date of the indictment) through January 7, 2019 (the date of the initial status conference), for the purposes of the Speedy Trial Act. The parties agree that the period between January 7, 2019, and

the date of the interim status conference requested in paragraph 8 be excluded pursuant to 18 U.S.C. § 3161(h)(7)(a). The parties submit that the ends of justice served by permitting defense counsel to review and evaluate the discovery outweighs the best interest of the public and the Defendant in a speedy trial.

7. The parties have not yet had an opportunity to discuss a possible plea. They estimate that a trial will take approximately two weeks.

8. The parties request that the interim status conference be scheduled in sixty days.

Respectfully submitted,

FRANKLIN FREDDY MEAVE VASQUEZ  
By his attorney,

/s/ Stellio Sinnis  
STELLIO SINNIS  
Assistant Federal Public Defender

ANDREW E. LELLING  
United States Attorney

By: /s/ Christine J. Wichers  
LAURA J. KAPLAN  
CHRISTINE J. WICHERS  
Assistant U.S. Attorneys

**Certificate of Service**

I certify that, on January 4, 2018, this document filed through the ECF system was sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Christine J. Wichers  
Christine J. Wichers